

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JONATHAN IRONS.

Plaintiff,

v.

JOHN NESKE, *et. al.*,

Defendants.

Case No. 4:21-cv-00293

Honorable Rodney W. Sippel
Chief Judge

JURY TRIAL DEMANDED

PLAINTIFF'S MOTION FOR EXTENSION OF TIME

Plaintiff, Jonathan Irons, by his attorneys, respectfully moves this Court for an extension of time to initiate proceedings in probate court to petition the court to appoint a representative for deceased defendant Michael Hanlen. In support of his motion, Plaintiff states:

1. On August 13, 2021, this Court granted Plaintiff's motion for an extension of time to comply with the Court's order (ECF No. 59). In doing so, the Court gave Plaintiff until September 15, 2021, to initiate proceedings in probate court and provide a status update.
2. Since then, Plaintiff has been diligently working to hire an experienced local probate attorney. On September 8, 2021, Plaintiff retained attorney Micah Hall (Missouri Bar No. 56184) to handle the petition in probate court.
3. In order to initiate proceedings, Ms. Hall will need Michael Hanlen's death certificate, as well as the identification of a legal representative. Plaintiff is working on obtaining those prerequisite materials.
4. As such, Plaintiff requests an additional two weeks, until September 29, 2021, to initiate proceedings in probate court and provide the Court with an initial status update.

5. If the Court grants Plaintiff's motion, Plaintiff will continue to provide updates every thirty days beginning September 29, 2021.

6. Plaintiff's counsel emailed counsel for the City Defendants on September 14, 2021, regarding this motion, and did not receive a response.

WHEREFORE, Plaintiff Jonathan Irons respectfully requests that this Court grant his order and extend the deadline for initiating proceedings in probate court and providing a status update to September 29, 2021.

RESPECTFULLY SUBMITTED,

JONATHAN IRONS

By: /s/ Makeba Rutahindurwa
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Makeba Rutahindurwa, an attorney, certify that on September 14, 2021, I served the foregoing Motion for an Extension of Time upon all counsel of record via electronic mail.

/s/ Makeba Rutahindurwa
One of Plaintiff's Attorneys